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United States of America

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

RALPH CONTRERAS, JR.,
Defendant.

Case No: 1:25-CR-00119-KES-BAM

STIPULATION TO CONTINUE STATUS
CONFERENCE AND EXCLUDE TIME UNDER
SPEEDY TRIAL ACT; AND ORDER

THE PARTIES HEREBY STIPULATE, through their respective attorneys of record, Assistant United States Attorney Brittany M. Gunter, counsel for the government, and Eric Schweitzer, counsel for Ralph Contreras, Jr. (“the defendant”), that this action’s **Wednesday, August 27, 2025, status conference be continued to Wednesday, December 10, 2025, at 1:00 p.m.** The parties likewise ask the court to endorse this stipulation by way of formal order.

The parties base this stipulation on good cause, as follows:

1. The grand jury returned an indictment regarding this matter on June 12, 2025. ECF 13.

Since then, the government prepared and delivered an initial set of discovery to defense counsel within the time limits set forth by the Local Rules. The defense is and has been

1 reviewing discovery thus far provided.

- 2 2. The government will follow up with law enforcement to determine the extent supplemental
3 discovery exists. If the government identifies additional information that should be produced
4 as supplemental discovery, the government will promptly produce it to defense counsel in
5 accord with Rule 16.
- 6 3. As defense counsel completes his analysis of the discovery produced in this case, counsel for
7 the government will work with the defense and the HSI Fresno office to ensure that the
8 defense is able to timely review, upon its request, any electronic evidence in this case in
9 accord with relevant provisions of the Adam Walsh Act.
- 10 4. Defense counsel requires more time to complete his review of the discovery, complete any
11 additional investigation, discuss the case with the defendant, arrange for a review of the
12 electronic evidence, and consider consulting with an expert.
- 13 5. By the time of the continued status conference and as all discovery is timely reviewed, the
14 parties further intend to explore the extent this case can be resolved prior to trial.
- 15 6. Defense counsel believes that failure to grant the above-requested continuance would deny
16 him the reasonable time necessary for effective preparation, taking into account the exercise
17 of due diligence.
- 18 7. The government does not object to the continuance.
- 19 8. The parties therefore stipulate that the period of time from August 27, 2025, through and
20 including December 10, 2025, is excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and
21 3161(h)(7)(B)(i) and (iv) because it results from a continuance granted by the Court at the
22 parties' request on the basis of the Court's finding that the ends of justice served by taking

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such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

Dated: August 19, 2025

ERIC GRANT
United States Attorney

By: /s/ BRITTANY M. GUNTER
BRITTANY M. GUNTER
Assistant United States Attorney

Dated: August 19, 2025

By: /s/ ERIC SCHWEITZER
ERIC SCHWEITZER
Attorney for Defendant
Ralph Contreras, Jr.

ORDER

IT IS ORDERED that the status conference currently set for August 27, 2025 is continued to **December 10, 2025, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe.**

IT IS FURTHER ORDERED THAT the period of time from August 27, 2025, through and including December 10, 2025, is excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv) because it results from a continuance granted by the Court at the parties' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: August 19, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE